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Subject: Comment on Guidance on 90 day waiting period limitation
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I work for a group health insurance broker, and we have several clients that have a new hire waiting period of “1st of the month following 90 days”. For example, if an employee is hired on August 20th, his 90 days would be up November 18th, and he would be eligible for coverage beginning December 1st. Is this a permissible waiting period, or must the actual coverage effective date be no more than 90 days after their date of full time here?

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